

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

GWENDOLYN P. McQUIRTER, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No.: 2:07-cv-234-MEF
)	
CITY OF MONTGOMERY, ALABAMA,)	
et al.,)	
)	
Defendants.)	

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on April 27, 2007, participants were:

Jerry M. Blevins for Plaintiffs

Kimberly O. Fehl for Defendants
2. **Pre-discovery Disclosures.** The parties will exchange the information required by Fed.R.Civ.P. 26(a)(1) within 21 days of the Court's Scheduling Conference Order.
3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:
 - A. Discovery will be needed on the following subjects: The allegations of the Complaint and all matters relevant thereto and those defenses asserted by Defendant in its Answer.
 - B. Disclosure or discovery of electronically stored information should be handled as follows: copies of any such information shall be produced as with non-electronically stored information.
 - C. The parties have agreed to an order regarding claims of privilege or of protection as trial-preparation material asserted after production, as follows: All materials to be held strictly confidential unless and until the Court rules otherwise.

- D. All discovery commenced in time to be completed by January 25, 2008.
- E. Maximum of 40 interrogatories by each party to any other party.
- F. Maximum of 40 requests for admission by each party to any other party.
- G. Maximum of 6 depositions by Plaintiff and Defendant.
- H. Each deposition other than of Plaintiffs and Defendant's corporate representative limited to maximum of 6 hours unless extended by agreement of parties.
- I. Reports from retained experts under Rule 26(a)(2) due:
 - from Plaintiffs by November 15, 2007;
 - from Defendant by November 30, 2007.
 - Supplementations under Rule 26(e) due December 6, 2007.

4. Other Items.

- A. The parties do not request a conference with the court before entry of the scheduling order.
- B. The parties request a pretrial conference in January 28, 2008.
- C. Plaintiffs should be allowed until October 15, 2007 to join additional parties and until – October 30, 2007 to amend the pleadings.
- D. Defendant should be allowed until October 30, 2007 to join additional parties and until November 14, 2007 to amend the pleadings.
- E. All potentially dispositive motions should be filed by October 30, 2007.
- F. Settlement cannot be evaluated prior to completion of discovery.
- G. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due
 - from Plaintiff by December 21, 2007;
 - from Defendant by December 21, 2007.

- H. Parties should have ten days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
- I. The case should be ready for trial by March 3, 2008, and at this time is expected to take approximately 2 days to try.

Date: April 27, 2007.

/s/ Jerry M. Blevins
Jerry M. Blevins (BLE003)
Counsel for Plaintiffs
Hillwood Office Center
2800 Zelda Road, Suite 200-3
Montgomery, Alabama 36106
(334) 262-7600 (Voice)
(334) 262-7644 (Fax)

/s/ Kimberly O. Fehl
Kimberly O. Fehl (FEH001)
Counsel for Defendant
City of Montgomery
P.O. Box 1111
Montgomery, Alabama 36101-1111
(334) 241-2050 (Voice)
(334) 241-2310 (Fax)